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Remarks:

Claims 1-12 are pending in this application.

Claim 4 has been amended to correct a typographical error.

In the outstanding office action, the Examiner has rejected claims 1, 2, 7, 8, 10, 11 and 12 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,880,864 to Williams, et al. (hereinafter "Williams").

In particular, the Examiner indicates the presence of "a plurality of service specific transceivers", as required by claims 1, 7 and 8, as "XMIT and RCVR" in FIG. 4 of Williams. It is submitted that XMIT and RCVR together make only a single transceiver. The Examiner then indicates the presence of claim elements performed by the plurality of service specific transceivers (receiving, aggregating, transmitting) in the (single) block marked SONET in FIG. 4 of Williams. It is submitted that the block marked SONET is a SONET multiplexer and not a transceiver. Thus, it is submitted that Williams discloses neither a plurality of service specific transceivers nor a single transceiver performing the claimed functions (receiving, aggregating, transmitting). The Examiner then cites the XMIT and RCVR in FIG. 4 of Williams as showing a wavelength access controller "receiving a plurality of service specific electrical signals". However, claims 1, 7 and 8 require that each transceiver transmits "said given service specific electrical signal to a wavelength access controller". It is submitted that the XMIT and RCVR cannot be both a transceiver and an access controller to which the transceiver transmits a signal. Furthermore, Williams fails to disclose that the wavelength access controller transmits "said wavelength division multiplexed signal...to an element of an optical transport network", as required by claims 1, 7 and 8. Quite the opposite, rather than sending the wavelength division multiplexed signal to an element of an optical transport network, the wavelength division multiplexed signal in Williams may be transmitted to multiple customer premises locations (endpoints). Withdrawal of the rejection of claims 1, 2-6 (which are dependent on claim 1), 7 and 8 as anticipated by Williams is therefore respectfully requested.

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The Examiner has rejected claim 10 under 35 U.S.C. 102(b) as being anticipated by Williams. In particular, the Examiner indicates that optical receiver 403 performs the claimed optical to electrical conversion ("converting said plurality of service specific optical signals to a corresponding plurality of service specific electrical signals"). However, it is submitted that the optical receiver 403 is disclosed to "selectably and optically split the wavelengths" of the received wavelength division multiplexed signal (see column 10, lines 48-50). That is, the output of the optical receiver is optical, not electrical. Furthermore, Williams has no disclosure of "segmenting said given service specific electrical signal to result in a plurality of output signals" at a plurality of service specific transceivers as required by claim 10. Withdrawal of the rejection of claim 10 as anticipated by Williams is therefore respectfully requested.

Claims 11 and 12 claim apparatus for carrying out the method of claim 10. As such, to properly reject claims 11 and 12 as anticipated by Williams requires the Examiner to illustrate that Williams discloses elements for optical to electrical conversion and segmentation as discussed in reference to claim 10 hereinbefore. It is submitted that Williams discloses neither. Withdrawal of the rejection of claims 11 and 12 as anticipated by Williams is therefore respectfully requested.

The Examiner has rejected claim 9 under 35 U.S.C. 103(a) as being unpatentable over Williams in view of U.S. Patent No. 6,128,666 to Muller, et al. (hereinafter "Muller"). The Examiner admits that Williams differs from claim 9 in that Williams does not disclose maintaining, at the wavelength access controller, "a database of information relating to resources in said optical transport network". The Examiner then cites Muller to provide a database. However, it is submitted that the database of Muller stores information related to packets and not information relating to resources in an optical transport network. A search engine in Muller receives packet header information and uses the received information to search the database to determine if there is information relevant to the packet such as the type of packet, e.g., VLAN supported or whether the packet can be routed (see col. 6, lines 7-11). Furthermore, the Examiner implicitly indicates the presence of the operability of Williams to "classify a service specific electrical signal from each of said plurality of service specific transceivers", "receive a

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connection request, from one of said plurality of service specific transceivers, for a path through said transport network", "determine, based on said information in said database, a path through said transport network corresponding to said connection request" and "signal said element of said optical transport network to set up said determined path through said transport network." It is submitted that such operability, as required by claim 9, is not present in either Williams or Muller. Indeed, Muller seems only to be cited to illustrate the use of a database in conjunction with a media access controller.

Without disclosure of the elements of claim 9, neither Williams nor Muller, nor a combination of these references, can render independent claim 9 obvious. Withdrawal of the rejection of claim 9 in view of Williams and Muller is therefore respectfully requested.

No new matter has been introduced by way of these amendments.

In view of the foregoing, early favorable consideration of the application is earnestly solicited.

Respectfully submitted,



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